

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

UNITED STATES OF AMERICA

§

§

v.

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Criminal No. M-22-1708-S1

JUAN ANTONIO CANTU-CAVAZOS

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SEALED SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

Count One

On or about September 21, 2022, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JUAN ANTONIO CANTU-CAVAZOS

knowingly being an alien who was illegally and unlawfully in the United States, did knowingly possess in and affecting interstate and foreign commerce, a firearm, namely, a Century Arms, Model VSKA, 7.62x99 caliber rifle.

In violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(8).

Count Two

Between on or about October 1, 2021, and on or about September 21, 2022, in the Southern District of Texas and elsewhere and within the jurisdiction of the Court, defendants,

JUAN ANTONIO CANTU-CAVAZOS

did knowingly conspire and agree together and with other persons known and unknown to the Grand Jurors to ship, transport, transfer, cause to be transported, and otherwise dispose of firearms to another person, in and affecting interstate and foreign commerce, knowing and having

reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony (as defined in section 932(a)).

In violation of Title 18, United States Code, Sections 933(a)(3), 933(a)(1), 933(b), and 2.

Count Three

From on or about October 1, 2021, to on or about September 21, 2022, in the Southern District of Texas, defendants,

JUAN ANTONIO CANTU-CAVAZOS
[REDACTED]

did fraudulently and knowingly export and send from the United States or attempt to export and send from the United States to the United Mexican States, any merchandise, article, or object, to wit: firearms, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

Count Four

On or about May 14, 2021, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

[REDACTED]
in connection with the acquisition of a firearm, namely, an Aero Precision, Model M4E1, multi-caliber rifle from Suppressed Tactical Solutions in Edinburg, Texas, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Suppressed Tactical Solutions which statement was intended and likely to deceive Suppressed Tactical Solutions as to a fact material to the lawfulness of such

acquisition of the said firearm under Chapter 44 of Title 18, United States Code, in that the defendant JOSE LUIS CABALLERO falsely represented on the ATF Form 4473 that he was the actual buyer of the firearm described above, when in truth and fact, JOSE LUIS CABALLERO knew that those statements and representations were false and he was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and Section 2.

Count Five

On or about June 14, 2021, in the Southern District of Texas and within the jurisdiction of the Court, defendant,



in connection with the acquisition of a firearm, namely, an Anderson Manufacturing, Model AM-15, 5.56x45mm NATO caliber rifle from Cash America Pawn of Donna in Donna, Texas, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Cash America Pawn of Donna which statement was intended and likely to deceive Cash America Pawn of Donna as to a fact material to the lawfulness of such acquisition of the said firearm under Chapter 44 of Title 18, United States Code, in that the defendant JOSE LUIS CABALLERO falsely represented on the ATF Form 4473 that he was that actual buyer of the firearm described above, when in truth and fact, JOSE LUIS CABALLERO knew that those statements and representations were false and he was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and Section 2.

NOTICE OF FORFEITURE
18 U.S.C. §933

Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461 the United States gives notice to defendants,

JUAN ANTONIO CANTU-CAVAZOS


that upon conviction of a violation of 18 U.S.C. §933, as charged in this Sealed Superseding Indictment, all merchandise trafficked, exported, or sent from the United States or attempted to be trafficked, exported, or sent from the United States contrary to law, or the proceeds or value thereof, and property used to facilitate the trafficking, exporting, or sending of such merchandise, the attempted trafficking, exporting, or sending of such merchandise, or the receipt, purchase, transportation, concealment, or sale of such merchandise prior to exportation shall be forfeited to the United States and includes, but is not limited to the following:

Century Arms rifle, Model VSKA, caliber 7.62, S/N: H-000, PIN#0583642,
Century Arms rifle, Model VSKA, caliber 7.62, S/N: H-0001, PIN#0583643,
Century Arms rifle, Model VSKA, caliber 7.62, S/N: H-002, PIN#0583644,
Century Arms rifle, Model VSKA, caliber 7.62, S/N: H-003, PIN#0583645,
Century Arms rifle, Model VSKA, caliber 7.62, S/N: SV7013140, PIN#0583648,
Century Arms rifle, Model VSKA, caliber 7.62, S/N: SV7013427, PIN #0583650,
Century Arms rifle, Model VSKA, caliber 7.62, S/N: SV7013481, PIN#0583649,
Century Arms rifle, Model VSKA, caliber 7.62, S/N: SV7013643, PIN#0583647,
Century Arms rifle, Model VSKA, caliber 7.62, S/N: SV7014528, PIN#0583646,
IO INC., Model Sporter, caliber 7.62, S/N: S037899, PIN#0578295,
Romarm, Model WASR, caliber 7.62, S/N: A1-41100-15, PIN#0573013,

Century Arms rifle, Model RAS47, caliber 7.62, S/N: RAS47025307, PIN#0573011,

Century Arms rifle, Model RAS47, caliber 7.62, S/N: RAS47029042, PIN#0573012,

Zastava, Model M90, caliber 7.62, S/N: 007326, PIN#0381075,

Zastava, Model M90, caliber 7.62, S/N: 007656, PIN#0381085,

Colt, Model M4, caliber 5.56, S/N: LE369452, PIN#0580469,

Colt, Model M4, caliber 5.56, S/N: LE369343, PIN#0580472,

Colt, Model M4, caliber 5.56, S/N: LE369430, PIN#0580468,

Glock pistol, Model 17, caliber 9mm, S/N: CRS204US PIN #555561,

Glock pistol, Model 19, caliber 9mm, S/N: MHC 106 PIN #521782,

Glock pistol, Model 19, caliber 9mm, S/N: MGZ 518 PIN #521709,

Glock pistol, Model 19, caliber 9mm, S/N: MHA 489 Prop #304 PIN#521769,

Glock pistol, Model 19, caliber 9mm, S/N: MHC 105 Prop #305 PIN#521781,

Glock pistol, Model 19, caliber 9mm, S/N: MHA 454 Prop #302 PIN#521751,

Glock pistol, Model 19, caliber 9mm, S/N: MHA 447 Prop #301 PIN#521744,

Glock pistol, Model 19, caliber 9mm, S/N: MHA 458 Prop #308 PIN#521755,

Glock pistol, Model 19, caliber 9mm, S/N: MGZ 514 Prop #309 PIN#521705,

Glock pistol, Model 19, caliber 9mm, S/N: MHA 488 Prop #303 PIN#521768,

Glock pistol, Model 19, caliber 9mm, S/N: MHA 457 Prop #307 PIN#521754,

Glock pistol, Model 19, caliber 9mm, S/N: BHDF924,

Glock pistol, Model 19, caliber 9mm, S/N: BEYV544,

Glock pistol, Model 19, caliber 9mm, S/N: ADEB13, and

\$37,000 Unites States currency.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

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FOREPERSON

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY